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7 *Attorneys for the Debtors and Reorganized Debtors*

8 **UNITED STATES BANKRUPTCY COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**  
10 **SAN FRANCISCO DIVISION**

11 **In re:**

12 **PG&E CORPORATION,**

13 **- and -**

14 **PACIFIC GAS AND ELECTRIC**  
15 **COMPANY,**

16 **Debtors.**

- 17 ☐ Affects PG&E Corporation  
18 ☐ Affects Pacific Gas and Electric Company  
19 ☒ Affects both Debtors

20 *\* ALL PAPERS SHALL BE FILED IN THE*  
21 *LEAD CASE, NO. 19-30088 (DM).*

Case Nos. 19-30088 (DM) (Lead Case)  
(Jointly Administered)

**STIPULATION ON REORGANIZED**  
**DEBTORS' OBJECTION TO PROOF OF**  
**CLAIM NO. 80260 FILED BY HOWARD**  
**KRAUSSE**

**Re: Dkt. No. 13608**

**Date: June 27, 2023**  
**Time: 11:30 a.m.**

1 This stipulation and agreement for order (“**Stipulation**”) is entered into by PG&E  
2 Corporation and Pacific Gas and Electric Company, as debtors and reorganized debtors (collectively,  
3 the “**Reorganized Debtors**”), on the one hand, and Howard Krausse (“**Krausse**”), on the other hand.  
4 The Reorganized Debtors and Krausse are referred to in this Stipulation collectively as the “**Parties**,”  
5 and each as a “**Party**.” The Parties hereby stipulate and agree as follows:

6 **RECITALS**

7 A. On March 10, 2023, the Reorganized Debtors filed the *Reorganized Debtors’ Objection*  
8 *to Proof of Claim No. 80260 Filed By Howard Krausse* [Dkt. No. 13608] (the “**Objection**”).  
9 Concurrently with the Objection, the Reorganized Debtors filed a notice of hearing [Dkt. No. 13610],  
10 which set the hearing on the Objection (the “**Hearing**”) for April 11, 2023, at 10:00 a.m. (Pacific  
11 Time).

12 B. The Hearing was subsequently continued to May 9, 2023 [Dkt. No. 13639] then to  
13 June 7, 2023 [Dkt. No. 13681], and is presently set for June 27, 2023 [Dkt. No. 13797].

14 C. On May 23, 2023, Krausse filed the *Response to Reorganized Debtors’ Objection to*  
15 *Proof of Claim No. 80260* [Dkt. No. 13768] (the “**Response**”).

16 D. The Parties met and conferred on June 16, 2023 and agreed to the following:

- 17 a. The Hearing scheduled for June 27, 2023 shall be taken off calendar and the  
18 Reorganized Debtors need not file a Reply to the Response;
- 19 b. The Parties will engage in discovery, including document demands,  
20 interrogatories, and fact witness depositions over the course of the next  
21 several months;
- 22 c. Thereafter the Parties will meet and confer over 1) the possibility of returning  
23 to mediation, and 2) setting a briefing schedule on dispositive motions (in the  
24 event either Party desires to file a dispositive motion);
- 25 d. A Status Conference should be set for September 12, 2023 at 10:00 a.m.

26 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**  
27 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**  
28 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**

1 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**  
2 **THAT:**

3 1. The Hearing shall be taken off calendar and the Reorganized Debtors are not required  
4 to file a Reply to the Response.

5 2. The Parties shall engage in fact discovery, including document demands,  
6 interrogatories, and fact witness depositions.

7 3. Thereafter, the Parties shall meet and confer over 1) the possibility of returning to  
8 mediation, and 2) setting a briefing schedule on dispositive motions (in the event either Party desires  
9 to file a dispositive motion);

10 4. A Status Conference shall be set for September 12, 2023 at 10:00 a.m.

11  
12 Dated: June 20, 2023

13 KELLER BENVENUTTI KIM LLP  
14 GOUGH & HANCOCK LLP

FOX ROTHSCHILD LLP

15 /s/ Thomas B. Rupp  
16 Thomas B. Rupp

/s/ Jack Praetzellis  
Jack Praetzellis

17 *Attorneys for the Debtors*  
18 *and Reorganized Debtors*

*Attorneys for Howard Krausse and Anne*  
*Potts*